

FLYNN & WIETZKE, P.C.

1205 Franklin Avenue, Suite 370
Garden City, N.Y. 11530
Tel: (516) 877-1234 Fax: (516) 877-1177

Marc Wietzke, Esq.
Admitted in NY & NJ

Sean Constable, Esq.
Admitted in NY & MA

Offices throughout the Northeast
Toll Free: (866) 877-FELA

October 11, 2022

Judge Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: RAMON OLIVERAS V. LONG ISLAND RAILROAD COMPANY
22 Civ. 4600 (LGS)(GWG)

Dear Judge Schofield:

We are plaintiff's counsel in the above-entitled case and write jointly with defendant pursuant to the Court's Order of August 2, 2022 (Docket 9) to provide a status report.

Discovery is ongoing without any issues to date. The parties have exchange Initial Disclosures and have served each other with interrogatories and requests for production. Plaintiff anticipates having responses to defendant shortly. The parties believe that depositions can be completed by the current November 30, 2022 deadline and that all other deadlines in the scheduling order can be complied with.

Very truly yours,



Sean Constable

SC:EF
cc: William Blumenschein, Esq.